

THE LAW OFFICES OF PETER E. ZIMNIS

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PETER E. ZIMNIS
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April 15, 2023

Clerk, U.S. Bankruptcy Court
402 East State Street
Trenton, New Jersey 08608

Re: Linda Brewer-Burton
Case No.: 21-19546 MBK

Dear Clerk:

In reference to the above named case, attached please find a Motion to Sanction Shellpoint Mortgage for Violation of Fed. Bankr R. 3002.1(b), the debtor's Certification, and a proposed form of Order.

Kindly contact this Office should you have any questions.

Very truly yours,

Law Office of Peter E. Zimnis

By: /s/ John Zimnis
John Zimnis, Esq.

c. Albert Russo, Chapter 13 Trustee
Shellpoint Mortgage
Padgett Law Group
Pincus Law Group
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LAW OFFICES OF PETER E. ZIMNIS
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Peter E. Zimnis
Attorney for Debtor(s)

_____	:	UNITED STATES BANKRUPTCY COURT
LINDA BREWER-BURTON:	:	DISTRICT OF NEW JERSEY
	:	
Debtors	:	CASE NO.: 21-19546 MBK
	:	CHAPTER 13
	:	NOTICE OF MOTION FOR SANCTIONS
	:	AGAINST SHELLPOINT MORTGAGE FOR
	:	VIOLATING <u>FED. BANKR. R. 3002.1(b)</u>
_____	:	ORAL ARGUMENT: Requested if Objection Filed

TO: All parties on attached service list

PLEASE TAKE NOTICE that on **May 10, 2023, at 9:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned will apply to the Honorable Judge presiding at such time, sitting at the United States Bankruptcy Court located at 402 East State Street, Trenton New Jersey for an Order for Sanctions, Attorney Fees, and other Relief.

Statement Per D.N.J. LBR 9013-1(a)(3)

The facts that the moving party relies upon as set forth in the accompanying Certification and the basis for the moving party's request is clearly set forth in the aforesaid papers as required by the Federal Bankruptcy Rules and the Local Rules. As the issues at hand do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary to aid the Court in deciding the Motion.

In support of this motion, the moving party will rely upon the information contained in attached documents along with arguments of counsel and testimony to be produced at the time aforesaid hearing.

Objections, if any should be filed with the Court and served upon the moving party within seven (7) days of the hearing date.

Law Offices of Peter E. Zimnis
Counsel for Debtor(s)

By: /s/ John Zimnis
John Zimnis, Esq.

Dated: